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Acting Secretary

Air Resources Board

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Arnold Schwarzenegger
Governor

May 2, 2006

The Honorable Stephen L. Johnson
U.S. Environmental Protection Agency
Air Emissions Reporting Requirements Rule
Docket No. OAR-2004-0489
Mailcode: 6102 T
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Johnson:

We have reviewed the U.S. Environmental Protection Agency's (U.S. EPA) proposed Air Emissions Reporting Requirements (AERR), published in the Federal Register, Vol. 71, No. 1. The proposed AERR rule includes several changes to the current emissions reporting requirements affecting California. These changes include accelerating the reporting schedule, eliminating specific emissions for reporting purposes (e.g., annual biogenic emissions), and allowing states the option of providing emission inventory model inputs rather than actual emissions estimates. Our key concern with the proposal is described below. In addition, we have provided detailed comments in the attachment to this letter.

Among the proposed changes to reporting requirements, staff of the California Air Resources Board (ARB) is most concerned with the acceleration of the reporting due dates. The proposed reporting schedule acceleration to 12 months for the 2008 inventory, followed by a further acceleration to 6 months by triennial year 2011, fails to recognize that California's emission inventory system is complex and involves the acquisition and processing of data from 35 Air Pollution Control/Air Quality Management Districts (Districts). The process required to develop a comprehensive inventory using data submitted by Districts, followed by quality assurance/quality control (QA/QC) checks on those data demands a schedule longer than that proposed in the AERR. It is our position that U.S. EPA should maintain the 17-month schedule under the Consolidated Emission Reporting Rule (CERR). Accelerating the timeline to less than 17 months is unrealistic and could potentially compromise data quality.

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our website: <http://www.arb.ca.gov>.

California Environmental Protection Agency

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ARB recognizes the importance of providing emissions inventory data to the public in a timely fashion and addresses this need through the annual publication and web posting of the California Almanac of Emissions & Air Quality. The Almanac contains historical, current, and projected emissions and air quality trends, and in conjunction with on-line data access tools provides the public with recent emissions information at the facility-level. We believe our present system of processing an inventory in a 17-month timeframe and providing web-based data access produces a quality inventory and allows the public to view the most recent and relevant air quality data in California.

Thank you for the opportunity to comment on the proposed AERR rule. If you have any questions regarding this letter or need further clarification on the above comments, please contact Mr. Webster Tasat at (916) 323-4950 or wtasat@arb.ca.gov.

Sincerely,

/s/

Linda C. Murchison, Chief
Planning and Technical Support Division

Attachment

cc: Mr. Bill Kuykendal
U.S. Environmental Protection Agency
Office of Air Quality Planning and Standards
Mail Code: D205-01
Research Triangle Park, North Carolina 27711

Webster Tasat, Manager
Emission Inventory Systems Section
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